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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA *ex rel.* STF,
11 LLC, an organization; STATE OF
CALIFORNIA; *ex rel.* STF, LLC, an
12 organization,

13 Plaintiffs,

14 v.

15 VIBRANT AMERICA, LLC, a Delaware
limited liability company,

16 Defendants.
17

Case No. 3:16-cv-02487-JCS

**JOINT UPDATED CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: March 19, 2021

Time: 2:00 p.m.

Judge: Hon. Joseph C. Spero

JOINT UPDATED CASE MANAGEMENT CONFERENCE STATEMENT

Relator STF, LLC (“Relator”), and Vibrant America, LLC (“Vibrant” or “Defendant”), submit this Joint Updated Case Management Conference Statement.

1. **Discovery:** Both Parties have issued and responded to extensive document requests, and Vibrant has issued interrogatory requests to which Relator has responded. Relator has taken a Rule 30(b)(6) deposition. The Parties agreed to, and the Court approved, an Attorneys’ Eyes Only (“AEO”) designation for certain confidential information related to Vibrant’s business operations and financial data to be produced by Vibrant.

2. **ADR:** Due to logistical issues given the COVID pandemic, one of the parties was unavailable for the mediation before Martin Quinn, of JAMS, scheduled for February 4, 2021. The mediation has been continued until March 22, 2021.

3. **CMC Continuance Request:** The Parties are focused on the March 22 continued mediation. The Parties do not have discovery issues at present that require guidance from the Court at this time. Accordingly, the Parties respectfully request that the March 19 CMC be continued for approximately 30 days.

Dated: March 12, 2021

COTCHETT, PITRE & McCARTHY LLP

By: /s/ Justin T. Berger
JUSTIN T. BERGER
BETHANY M. HILL

Attorneys for Relator

Dated: March 12, 2021

FOLEY & LARDNER LLP

By: /s/ Thomas S. Brown
LORI A. RUBIN
THOMAS S. BROWN

Attorney for Defendant Vibrant America, Inc.